

# DRURY LEGAL

Drury Legal, LLC  
6 Carriage Lane  
Highwood, Illinois 60040

[scott@drurylegal.com](mailto:scott@drurylegal.com) / 312.358.8225

September 30, 2022

VIA EMAIL

Jon Loevy ([jon@loevy.com](mailto:jon@loevy.com))  
Loevy & Loevy  
311 N. Aberdeen, Third Floor  
Chicago, Illinois 60607

Dear Mr. Loevy:

Thank you for your September 30, 2022 email, in which you clarify the types of client files Loevy & Loevy intends to transfer to Drury Legal, LLC by the close of business today. In your email, you requested that I let you know if Loevy & Loevy has overlooked materials that should be transferred. The email does not reference transfer of email communications. I previously requested the transfer of emails, as they contain communications with defense counsel, expert witnesses, co-counsel and the clients. I believe I may be able to obtain my email files through an Outlook file on the firm-issued laptop. If so, the file would contain all emails. Assuming an Outlook file with my emails exists, I believe this would be the most efficient way for me to obtain them. Please confirm that I may include any Outlook file among the materials I can copy.

In addition to emails, as discussed below, Valerie Rogoff and Jenny Vance have completed Representation Directives and Notices of Termination with respect to their matters. All materials related to their matters should be copied and transferred. The Notices of Termination set forth the matters at issue. Copying their materials should not delay delivery of the materials Loevy & Loevy already agreed to copy and transfer.

Additionally, I request that Loevy & Loevy transfer to me the portion of the Google Sheet containing information regarding my court admissions and passwords to access various court filing systems. Once that information is transferred, please permanently delete it.

Your email also states that I can request user credentials from Goldfynch to access various document databases. However, the email states that Loevy & Loevy “will continue to pay for the maintenance of such databases,” indicating that Loevy & Loevy will also be able to access the databases. Given that Loevy & Loevy has been terminated from the matters at issue (further addressed below), the proposal is not acceptable and would raise serious work-product issues. As such, it is necessary that the databases be transferred to and maintained by Drury Legal, LLC, without Loevy & Loevy having any ability to access them. Solely as an interim measure, I may choose to establish a user account while the requested transfer is taking place.

Further, attached hereto are Notices of Termination from Aaron Hurvitz, David Mutnick, Valerie Rogoff, Mark Smithivas, Jenny Vance, Steven Vance and Andrea Vestrand. I have also attached Representation Directives from Jenny Vance and Valerie Rogoff. While not necessary, out of an abundance of caution, the clients have provided the Notices of Termination to, again,

Jon Loevy  
Correspondence

September 30, 2022  
Page 2

document their termination of Loevy & Loevy's services and to direct Loevy & Loevy to withdraw from their matters and transfer all relevant files. The Notices of Termination set forth the matters at issue. Consistent with the clients' directives, please withdraw the appearances of Loevy & Loevy attorneys from the clients' matters. As I stated in response to one of your previous emails, if you believe there is an issue with the clients' directives, please let me know before engaging in unnecessary motion practice.

In your email, you state that I "may access any material prepared for the matters [I] identified in [my] September 26 letter and make copies thereof." As set forth above, since the issuance of the September 26 letter, Ms. Vance and Ms. Rogoff have executed Representation Directives and Notices of Termination. As such, their matters should be among the materials that I may access and copy. Further, the other Notices of Termination set forth the various matters on which Loevy & Loevy worked for the various clients. To the extent there is a discrepancy between the September 26 letter and the Notices of Termination with respect to the matters at issue, the combined set of matters listed in both documents should control. Please confirm your agreement.


While your email states that I may access and copy specified client materials, please confirm that I may also access and copy other materials I prepared, such as memoranda, CLEs and research files. I believe I am entitled to copy those materials. If you disagree, please explain.

Your email also addresses various unpaid expert invoices. You write that "the firm stands on its entitlement to financial contributions to the case." It is unclear to me what that means. Drury Legal, LLC intends to pay the invoices. However, I am available to meet with you the morning of October 2, 2022 to discuss this further, as well as attempt to resolve open issues. I suggest that the two of us meet at a public location in Skokie, which I believe is between our respective residences.

Finally, your email references my resignation. The long history that necessitated my resignation is well documented. Thus, there is no need for me to address the issue further – nor is such a dialogue productive.

I would appreciate your responses to the various issues raised herein by 5:00 p.m. on October 1, 2022, particularly regarding access to client materials, for which time is of the essence.

Very truly yours,



---

SCOTT R. DRURY

Attachments

**NOTICE OF TERMINATION**

To whom it may concern at Loevy & Loevy:

The attached Representation Directive terminated Loevy & Loevy as my attorneys in the matters listed below, as well as any other matter in which it has represented or performed work for me (collectively, the "Matters"). However, out of an abundance of caution, I now provide this Notice of Termination. Effective immediately, Loevy & Loevy is hereby terminated from its representation of me in the Matters. Please immediately: (a) cease performing work on the Matters and, where Loevy & Loevy and/or its attorneys have appeared in any capacity in any Matter on my behalf, please withdraw therefrom; and (b) turn over to Scott R. Drury and Drury Legal, LLC all records, files and property related to the Matters, including all correspondence and emails. Contact information for Scott R. Drury/Drury Legal, LLC is:

Scott R. Drury  
Drury Legal, LLC  
6 Carriage Lane  
Highwood, Illinois 60040  
(312) 358-8225  
scott@drurylegal.com

**The Matters**

- *In re: Clearview AI, Inc., Consumer Privacy Litigation*, No. 1:21-cv-135 (N.D. Ill.);
- *In re: Clearview AI, Inc., Consumer Privacy Litigation*, MDL Dkt. No. 2967 (J.P.M.L.);
- *Hurvitz v. Clearview AI, Inc.*, No. 1:21-cv-2960 (E.D.N.Y.);
- *Hurvitz v. Clearview AI, Inc.*, No. 1:21-cv-3373 (N.D. Ill.);
- Any other matter on which Loevy & Loevy has appeared on my behalf or performed work on my behalf.

Aaron Hurvitz

\_\_\_\_\_  
AARON HURVITZ

*Aaron Hurvitz*  
\_\_\_\_\_  
SIGNATURE

9/28/22

\_\_\_\_\_  
DATE

**REPRESENTATION DIRECTIVE**

Please, at you earliest opportunity:

- (1) Check the appropriate statement reflecting your wishes regarding your representation.
- (2) Retain a copy of your directive for your records.
- (3) Return an executed copy to me at [scott@drurylegal.com](mailto:scott@drurylegal.com). *To best protect your interests and promote continuity of representation, please respond as soon as you can.*

☒ I wish to continue being represented by Scott R. Drury in all legal matters of mine in which Mr. Drury has previously provided legal assistance. I direct Scott R. Drury and Drury Legal, LLC to take the necessary actions to obtain all records, files and property in the possession of Loevy & Loevy related to my matters as quickly as possible.

☐ I wish to continue being represented by Loevy & Loevy. Please have a firm representative contact me to discuss continuity of representation.

☐ I wish to now be represented by \_\_\_\_\_

Name and Address of other lawyer: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Aaron A. Hurvitz  
\_\_\_\_\_  
PRINTED NAME

*Aaron Hurvitz*  
\_\_\_\_\_  
SIGNATURE

9/23/22  
\_\_\_\_\_  
DATE

**NOTICE OF TERMINATION**

To whom it may concern at Loevy & Loevy:

The attached Representation Directive terminated Loevy & Loevy as my attorneys in the matters listed below, as well as any other matter in which it has represented or performed work for me (collectively, the "Matters"). However, out of an abundance of caution, I now provide this Notice of Termination. Effective immediately, Loevy & Loevy is hereby terminated from its representation of me in the Matters. Please immediately: (a) cease performing work on the Matters and, where Loevy & Loevy and/or its attorneys have appeared in any capacity in any Matter on my behalf, please withdraw therefrom; and (b) turn over to Scott R. Drury and Drury Legal, LLC all records, files and property related to the Matters, including all correspondence and emails. Contact information for Scott R. Drury/Drury Legal, LLC is:

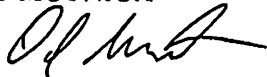
Scott R. Drury  
Drury Legal, LLC  
6 Carriage Lane  
Highwood, Illinois 60040  
(312) 358-8225  
scott@drurylegal.com

**The Matters**

- *In re: Clearview AI, Inc., Consumer Privacy Litigation*, No. 1:21-cv-135 (N.D. Ill.);
- *Mutnick v. Clearview AI, Inc.*, No. 1:20-cv-512 (N.D. Ill.);
- *In re: Clearview AI, Inc., Consumer Privacy Litigation*, MDL Dkt. No. 2967;
- Any other matter on which Loevy & Loevy has appeared on my behalf or performed work on my behalf.

---

DAVID MUTNICK



---

SIGNATURE

9/28/2022

---

DATE

**REPRESENTATION DIRECTIVE**

Please, at you earliest opportunity:

- (1) Check the appropriate statement reflecting your wishes regarding your representation.
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- (3) Return an executed copy to me at [scott@drurylegal.com](mailto:scott@drurylegal.com). *To best protect your interests and promote continuity of representation, please respond as soon as you can.*

☒ I wish to continue being represented by Scott R. Drury in all legal matters of mine in which Mr. Drury has previously provided legal assistance. I direct Scott R. Drury and Drury Legal, LLC to take the necessary actions to obtain all records, files and property in the possession of Loevy & Loevy related to my matters as quickly as possible.

☐ I wish to continue being represented by Loevy & Loevy. Please have a firm representative contact me to discuss continuity of representation.

☐ I wish to now be represented by \_\_\_\_\_

Name and Address of other lawyer: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

David Mutnick

\_\_\_\_\_  
PRINTED NAME

  
\_\_\_\_\_  
SIGNATURE

9/24/2022

\_\_\_\_\_  
DATE

**NOTICE OF TERMINATION**

To whom it may concern:


The attached Representation Directive terminates Loevy & Loevy as my attorneys in the matters listed below, as well as any other matter in which it has represented or performed work for me (collectively, the "Matters"). However, out of an abundance of caution, I also provide this Notice of Termination. Effective immediately, Loevy & Loevy is hereby terminated from its representation of me in the Matters. Please immediately: (a) cease performing work on the Matters and, where Loevy & Loevy and/or its attorneys have appeared in any capacity in any Matter on my behalf, please withdraw therefrom; and (b) turn over to Scott R. Drury and Drury Legal, LLC all records, files and property related to the Matters, including all correspondence and emails. Contact information for Scott R. Drury/Drury Legal, LLC is:

Scott R. Drury  
Drury Legal, LLC  
6 Carriage Lane  
Highwood, Illinois 60040  
(312) 358-8225  
scott@drurylegal.com

**The Matters**

- *Rogoff v. T-Mobile USA, Inc.*, No. 2:21-cv-01157-BJR (W.D. Wash.);
- *In re: T-Mobile Customer Data Security Breach Litigation*, No. 4:21-MD-3019-BCW (W.D. Mo.);
- *In re: T-Mobile Customer Data Security Breach Litigation*, MDL No. 3019 (J.P.M.L.)
- Any other matter on which Loevy & Loevy has appeared on my behalf or performed work on my behalf.

\_\_\_\_\_  
VALERIE ROGOFF

\_\_\_\_\_  
  
SIGNATURE

\_\_\_\_\_  
09/28/2022  
DATE

**REPRESENTATION DIRECTIVE**

Please, at you earliest opportunity:

- (1) Check the appropriate statement reflecting your wishes regarding your representation.
- (2) Retain a copy of your directive for your records.
- (3) Return an executed copy to me at [scott@drurylegal.com](mailto:scott@drurylegal.com). *To best protect your interests and promote continuity of representation, please respond as soon as you can.*

☒ I wish to continue being represented by Scott R. Drury in all legal matters of mine in which Mr. Drury has previously provided legal assistance. I direct Scott R. Drury and Drury Legal, LLC to take the necessary actions to obtain all records, files and property in the possession of Loevy & Loevy related to my matters as quickly as possible.

☐ I wish to continue being represented by Loevy & Loevy. Please have a firm representative contact me to discuss continuity of representation.

☐ I wish to now be represented by \_\_\_\_\_

Name and Address of other Lawyer: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Valerie Rogoff  
PRINTED NAME

V. Rogoff  
SIGNATURE

09/28/2022  
DATE



**NOTICE OF TERMINATION**

To whom it may concern at Loevy & Loevy:

The attached Representation Directive terminated Loevy & Loevy as my attorneys in the matters listed below, as well as any other matter in which it has represented or performed work for me (collectively, the "Matters"). However, out of an abundance of caution, I now provide this Notice of Termination. Effective immediately, Loevy & Loevy is hereby terminated from its representation of me in the Matters. Please immediately: (a) cease performing work on the Matters and, where Loevy & Loevy and/or its attorneys have appeared in any capacity in any Matter on my behalf, please withdraw therefrom; and (b) turn over to Scott R. Drury and Drury Legal, LLC all records, files and property related to the Matters, including all correspondence and emails. Contact information for Scott R. Drury/Drury Legal, LLC is:

Scott R. Drury  
Drury Legal, LLC  
6 Carriage Lane  
Highwood, Illinois 60040  
(312) 358-8225  
scott@drurylegal.com

**The Matters**

- *Mark S. v. College Board*, No. 1:19-cv-8068 (N.D. Ill.);
- *In re: TikTok, Inc., Consumer Privacy Litigation*, 1:21-cv-4699 (N.D. Ill.);
- *T.K. v. ByteDance Technology Company, Ltd.*, No. 1:19-cv-7915 (N.D. Ill.);
- Any other matter on which Loevy & Loevy has appeared on my behalf or performed work on my behalf.

**Mark Smithivas**

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MARK SMITHIVAS



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SIGNATURE

**9/30/22**

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DATE

**REPRESENTATION DIRECTIVE**

Please, at you earliest opportunity:

- (1) Check the appropriate statement reflecting your wishes regarding your representation.
- (2) Retain a copy of your directive for your records.
- (3) Return an executed copy to me at [scott@drurylegal.com](mailto:scott@drurylegal.com). *To best protect your interests and promote continuity of representation, please respond as soon as you can.*

☒

I wish to continue being represented by Scott R. Drury in all legal matters of mine in which Mr. Drury has previously provided legal assistance. I direct Scott R. Drury and Drury Legal, LLC to take the necessary actions to obtain all records, files and property in the possession of Loevy & Loevy related to my matters as quickly as possible.

☐

I wish to continue being represented by Loevy & Loevy. Please have a firm representative contact me to discuss continuity of representation.

☐

I wish to now be represented by \_\_\_\_\_

Name and Address of other Lawyer: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

**Mark Smithivas**

\_\_\_\_\_  
PRINTED NAME



\_\_\_\_\_  
SIGNATURE

**09/26/22**

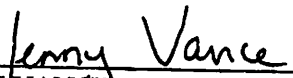
\_\_\_\_\_  
DATE

**NOTICE OF TERMINATION**

To whom it may concern at Loevy & Loevy:

Effective immediately, Loevy & Loevy is hereby terminated from its representation of me in connection with any work related to the Megaface database, as well as any other matter in which it has represented or performed work for me (collectively, the "Matters"). Please immediately: (a) cease performing work on the Matters and, where Loevy & Loevy and/or its attorneys have appeared in any capacity in any Matter on my behalf, please withdraw therefrom; and (b) turn over to Scott R. Drury and Drury Legal, LLC all records, files and property related to the Matters, including all correspondence and emails. Contact information for Scott R. Drury/Drury Legal, LLC is:

Scott R. Drury  
Drury Legal, LLC  
6 Carriage Lane  
Highwood, Illinois 60040  
(312) 358-8225  
scott@drurylegal.com

  
\_\_\_\_\_  
JENNY VANCE

  
\_\_\_\_\_  
SIGNATURE

9/28/22  
\_\_\_\_\_  
DATE

**REPRESENTATION DIRECTIVE**

Please, at you earliest opportunity:

- (1) Check the appropriate statement reflecting your wishes regarding your representation.
- (2) Retain a copy of your directive for your records.
- (3) Return an executed copy to me at [scott@drurylegal.com](mailto:scott@drurylegal.com). *To best protect your interests and promote continuity of representation, please respond as soon as you can.*

☒ I wish to continue being represented by Scott R. Drury in all legal matters of mine related to the "Megaface" database and/or any other matter in which Scott R. Drury has provided legal assistance. I direct Scott R. Drury and Drury Legal, LLC to take the necessary actions to obtain all records, files and property in the possession of Loevy & Loevy related to my matters as quickly as possible.

☐ I wish to continue being represented by Loevy & Loevy. Please have a firm representative contact me to discuss continuity of representation.

☐ I wish to now be represented by \_\_\_\_\_

Name and Address of other lawyer: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Jenny Vance  
PRINTED NAME

[Signature]  
SIGNATURE

9/28/22  
DATE

**NOTICE OF TERMINATION**

To whom it may concern at Loevy & Loevy:

The attached Representation Directive terminated Loevy & Loevy as my attorneys in the matters listed below, as well as any other matter in which it has represented or performed work for me (collectively, the "Matters"). However, out of an abundance of caution, I now provide this Notice of Termination. Effective immediately, Loevy & Loevy is hereby terminated from its representation of me in the Matters. Please immediately: (a) cease performing work on the Matters and, where Loevy & Loevy and/or its attorneys have appeared in any capacity in any Matter on my behalf, please withdraw therefrom; and (b) turn over to Scott R. Drury and Drury Legal, LLC all records, files and property related to the Matters, including all correspondence and emails. Contact information for Scott R. Drury/Drury Legal, LLC is:

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6 Carriage Lane  
Highwood, Illinois 60040  
(312) 358-8225  
scott@drurylegal.com

**The Matters**

- *In re: Clearview AI, Inc., Consumer Privacy Litigation*, No. 1:21-cv-135 (N.D. Ill.);
- *In re: Clearview AI, Inc., Consumer Privacy Litigation*, MDL Dkt. No. 2967 (J.P.M.L.);
- *Mutnick v. Clearview AI, Inc.*, No. 1:20-cv-512 (N.D. Ill.);
- *Vance v. Microsoft Corp.*, No. 2:20-cv-1082-JLR (W.D. Wash.);
- *Vance v. Amazon.com, Inc.*, No. 2:20-cv-1084-JLR (W.D. Wash.);
- *Vance v. Int'l Business Machines Corp.*, No. 1:20-cv-577 (N.D. Ill.);
- *Vance v. FaceFirst, Inc.*, No. 2:20-cv-6244-DMG-KS (C.D. Cal.);
- *Vance v. Google LLC*, No. 5:20-cv-4696-BLF (N.D. Cal.);
- Any other matter on which Loevy & Loevy has appeared on my behalf or performed work on my behalf.

---

STEVEN VANCE



---

SIGNATURE

September 29, 2022

---

DATE

**REPRESENTATION DIRECTIVE**

Please, at you earliest opportunity:

- (1) Check the appropriate statement reflecting your wishes regarding your representation.
- (2) Retain a copy of your directive for your records.
- (3) Return an executed copy to me at [scott@drurylegal.com](mailto:scott@drurylegal.com). *To best protect your interests and promote continuity of representation, please respond as soon as you can.*

☒ I wish to continue being represented by Scott R. Drury in all legal matters of mine in which Mr. Drury has previously provided legal assistance. I direct Scott R. Drury and Drury Legal, LLC to take the necessary actions to obtain all records, files and property in the possession of Loevy & Loevy related to my matters as quickly as possible.

☐ I wish to continue being represented by Loevy & Loevy. Please have a firm representative contact me to discuss continuity of representation.


☐ I wish to now be represented by \_\_\_\_\_

Name and Address of other lawyer: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Steven Vance

\_\_\_\_\_  
PRINTED NAME

  
\_\_\_\_\_  
SIGNATURE

September 25, 2022  
\_\_\_\_\_  
DATE

**NOTICE OF TERMINATION**

To whom it may concern:

The attached Representation Directive terminated Loevy & Loevy as my attorneys in the matters listed below, as well as any other matter in which it has represented or performed work for me (collectively, the "Matters"). However, out of an abundance of caution, I now provide this Notice of Termination. Effective immediately, Loevy & Loevy is hereby terminated from its representation of me in the Matters. Please immediately: (a) cease performing work on the Matters and, where Loevy & Loevy and/or its attorneys have appeared in any capacity in any Matter on my behalf, please withdraw therefrom; and (b) turn over to Scott R. Drury and Drury Legal, LLC all records, files and property related to the Matters, including all correspondence and emails. Contact information for Scott R. Drury/Drury Legal, LLC is:

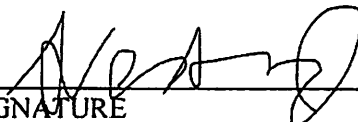
Scott R. Drury  
Drury Legal, LLC  
6 Carriage Lane  
Highwood, Illinois 60040  
(312) 358-8225  
scott@drurylegal.com

**The Matters**

- *In re: Clearview AI, Inc., Consumer Privacy Litigation*, No. 1:21-cv-135 (N.D. Ill.);
- *In re: Clearview AI, Inc., Consumer Privacy Litigation*, MDL Dkt. No. 2967 (J.P.M.L.);
- *Vestrand v. Clearview AI, Inc.*, No. 2:21-cv-4360 (C.D. Cal.);
- *Vestrand v. Clearview AI, Inc.*, No. 1:21-cv-3372 (N.D. Ill.);
- Any other matter on which Loevy & Loevy has appeared on my behalf or performed work on my behalf.

---

ANDREA VESTRAND

  
SIGNATURE

09/29/2022

---

DATE

**REPRESENTATION DIRECTIVE**

Please, at your earliest opportunity:

- (1) Check the appropriate statement reflecting your wishes regarding your representation.
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☐ I wish to now be represented by \_\_\_\_\_

Name and Address of other lawyer: \_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_

Andrea Vestrand

\_\_\_\_\_  
PRINTED NAME

  
\_\_\_\_\_  
SIGNATURE

9-23-2022

\_\_\_\_\_  
DATE